

From: [Ackerman, Mark](#)
To: [Aiello, Christine \(EGLE\)](#)
Cc: [Buckmaster, Tarek \(DEQ\)](#)
Subject: RE: Example permit language for BATW purge allowance reopener
Date: Wednesday, July 21, 2021 8:42:00 AM

Good morning Christine. I'm meeting with IDEM and EPA HQ to run through a permit mod to incorporate BATW purge next week. We can touch base afterwards and we can run through the details of that discussion. I'll reach out afterwards to set something up with you.

Mark Ackerman (he/him/his) | Water Division Permits Branch, U.S. Environmental Protection Agency | 77 W. Jackson Blvd., Chicago, IL 60604 | ph: 312-353-4145 |

From: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>
Sent: Monday, July 19, 2021 7:09 AM
To: Ackerman, Mark <ackerman.mark@epa.gov>
Cc: Buckmaster, Tarek (DEQ) <BUCKMASTERT@michigan.gov>
Subject: RE: Example permit language for BATW purge allowance reopener

Thanks, Mark. We'll reach out after we've gotten into this more ourselves.

Christine Aiello

Environmental Quality Specialist
Industrial and Storm Water Permits Unit
Permits Section | Water Resources Division
Michigan Department of Environment, Great Lakes, and Energy
525 West Allegan | P.O. Box 30457 | Lansing, MI 48909
aiello@michigan.gov | 517.294.0984 – NEW PHONE NUMBER

[Michigan.gov/EGLE](https://michigan.gov/EGLE) | [Follow Us](#)



From: Ackerman, Mark <ackerman.mark@epa.gov>
Sent: Friday, July 16, 2021 2:47 PM
To: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>
Cc: Buckmaster, Tarek (EGLE) <BUCKMASTERT@michigan.gov>
Subject: RE: Example permit language for BATW purge allowance reopener

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Hi Christine. Sorry I didn't follow up with you and don't have an example to share. Indiana is in about the same place as Belle River and Monroe.

Do you have details regarding the type of BATW technology either Belle River or Monroe might be considering? The preamble includes some information on anticipated volumes for various scenarios addressed by the rule. If you want we can set up a meeting for next week to walk through the details and outline some language. Send me some available times and I will send out a Teams invite.

Mark Ackerman (he/him/his) | Water Division Permits Branch, U.S. Environmental Protection Agency | 77 W. Jackson Blvd., Chicago, IL 60604 | ph: 312-353-4145 |

From: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>
Sent: Friday, July 16, 2021 1:20 PM
To: Ackerman, Mark <ackerman.mark@epa.gov>
Cc: Buckmaster, Tarek (DEQ) <BUCKMASTERT@michigan.gov>
Subject: Example permit language for BATW purge allowance reopener

Hi Mark,

Were you going to send us example permit language (possibly from Indiana?) we might use to help us develop language for Belle River – to address your concern below regarding the need for a reopener that allows for development of a site-specific BATW purge allowance?

We were expecting to receive something of this nature from you after our call on 6/29/21, but to the best of our knowledge have not.

Please advise, thanks -

Christine Aiello

Environmental Quality Specialist
Industrial and Storm Water Permits Unit
Permits Section | Water Resources Division
Michigan Department of Environment, Great Lakes, and Energy
525 West Allegan | P.O. Box 30457 | Lansing, MI 48909
aielloc@michigan.gov | 517.294.0984 – NEW PHONE NUMBER

Michigan.gov/EGLE | [Follow Us](#)



From: Ackerman, Mark <ackerman.mark@epa.gov>
Sent: Tuesday, June 1, 2021 7:33 AM
To: Buckmaster, Tarek (EGLE) <BUCKMASTERT@michigan.gov>
Cc: Aiello, Christine (EGLE) <AIELLOC@michigan.gov>
Subject: RE: Belle River Status

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Hi Tarek. I'm not back yet, but got pulled into a call in a separate permitting matter in another state that referenced Belle River and noticed the BATW limitation. The permit language as written requires ELG compliant BATW technology to achieve a up to a 90% reduction in BATW discharges to surface waters which is inconsistent with the rule. See 40 cfr 423.13(k)(1)(i) (i.e. ELG standard for BATW is zero discharge unless any of the conditions in 40 cfr 423.13(k)(2)(i)(A)(1)-(4) apply then a site specific allowance can be developed that allows up to 10% of BATW to be discharged to surface water).

If Belle River decides not to permanently cease coal burning activity, and needs to discharge BATW, then the permit will need to include a site specific purge allowance. Without specific knowledge regarding the direction Belle River take, the permit may need to include a reopener that allows for development of a site specific BATW purge allowance (if the zero discharge limit can not be achieved) when the new BAT limit takes effect on or before the ASAP date for BATW.

Mark Ackerman (he/him/his) | Water Division Permits Branch, U.S. Environmental Protection Agency | 77 W. Jackson Blvd., Chicago, IL 60604 | ph: 312-353-4145 |

From: Buckmaster, Tarek (EGLE) <BUCKMASTERT@michigan.gov>
Sent: Friday, May 28, 2021 9:15 AM
To: Ackerman, Mark <ackerman.mark@epa.gov>
Cc: Aiello, Christine (DEQ) <AielloC@michigan.gov>
Subject: RE: Belle River Status

Hi Mark. Belle River was placed on Public Notice from April 5 through May 5 for a permit modification to incorporate the requirements of the updated ELGs. We received comments from Sierra Club and are working with the permittee to revise the permit condition schedule and language to address the comments. We also placed CECO-JH Campbell on PN from April 14-May 14 (extended to May 21 for Sierra Club to submit comments) to modify their permit. We will likely modify the language in that permit to address similar comments received from Sierra Club. Both comment letters are attached and I will forward the two emails with the PN documents attached.

Let us know if you have any questions or concerns. I guess, welcome back to Chicago too!

Tarek Buckmaster
Industrial and Storm Water Permits Unit Supervisor
Permits Section, Water Resources Division
Michigan Department of Environment, Great Lakes, and Energy
517-230-4233 | buckmastert@michigan.gov
[Follow Us](#) | [Michigan.gov/EGLE](https://michigan.gov/EGLE)

From: Ackerman, Mark <ackerman.mark@epa.gov>
Sent: Friday, May 28, 2021 7:31 AM
To: Buckmaster, Tarek (EGLE) <BUCKMASTERT@michigan.gov>
Subject: Belle River Status

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

Hi Tarek. What is the reissuance status of Belle River (pre-public notice, or draft)?

Mark Ackerman | Water Division Permits Branch, U.S. Environmental Protection Agency | 77
W. Jackson Blvd., Chicago, IL 60604 | ph: 312-353-4145 |